

APPENDIX E

PARTIAL LIST OF ACTIONS TAKEN IN RESPONSE TO SAFETY MANAGEMENT EVALUATION OF FACILITY DISPOSITION PROGRAMS AT THE EAST TENNESSEE TECHNOLOGY PARK, SEPTEMBER 1997

Issue: Definition of DOE roles and responsibilities re. Reindustrialization activities

Response: Policy for responsibility for safety oversight of lessee employees has been formally established. Two memos: Clark to Seay (2/10/98), and Nelson to Seay and Adams (5/13/98) establish ES&H Oversight Responsibilities

Currently: Office of Reindustrialization

Transition to ETTP Site Office

Ultimate transition of S&H responsibility for commercial operation in leased space to OSHA

Currently: DOE Reindustrialization has responsibility for H&S requirements in leased space

Periodic walkthroughs patterned after OSHA's assistance and consultation program

Safety Council formed with DOE, Bechtel Jacobs, and tenant participation

Comprehensive responsibility matrix has been developed

OSHA Pilot conducted in August

Reindustrialization Business Practices define requirements

Lessees considered "Co-located" workers with appropriate training and access controls

Leases require lessees to comply with OSHA standards

Transition Activities:

DOE ETTP Site Office to assume responsibility for S&H Oversight of lessees until OSHA takes jurisdiction

Continue OSHA Pilot

Evaluate alternative worker classification whereby all site residents (M&I, other DOE primes, subcontractors, lessees, etc.) are required to have the same basic access training.

CROET and DOE Reindustrialization staff have been augmented with S&H professionals to ensure lease requirements and controls are being met

Issue: Leasing of shared spaces in facilities that have not been fully decontaminated.

Response: Characterization and decontamination activities will continue to ensure leasing does not pose an unacceptable risk in K-1401.

Risk-based scoping radiological survey completed

Involved approximately 16,000 measurements resulting in an estimated radiation dose of 0.02 to 16 mrem/yr.

Approximately 140,000 s.f. of K-1401, outside of leased space, being decontaminated under a no-cost contract to DOE

Routine monitoring throughout K-1401 continues to ensure no migration of contamination

Issue: Leasing of shared spaces in facilities that have not been fully decontaminated.

Characterization surveys continue to enable down-posting of the building where appropriate

Radiological Protection Program is implemented IAW 10 CFR 835

Authorization basis reviewed for each lease to ensure protection of lessee workers

Screening-level risk assessments are performed for each lease

DOE requires baseline environmental assessment reports on each facility to be reindustrialized. (DOE/ORO is not required to perform baseline assessments(screening level risk assessments). We perform them to ensure we do not create a situation where workers are exposed to an environment that exceeds guidelines, requirements or regulations)

Through the lease with CROET and flowdown provisions to the tenant, DOE requires the development of a Health and Safety Plan and participation in Safety and Health Council
DOE will conduct inspections of tenant facilities until OSHA assumes jurisdiction responsibilities.